

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLOBAL GAMING PHILIPPINES, LLC,

Plaintiff,

v.

ENRIQUE K. RAZON, JR., et al.,

Defendants.

No. 21-CV-2655 (LGS)

DECLARATION OF NINEZ C. MANINGAT

I, Ninez C. Maningat, hereby declare as follows:

1. I am an attorney and a partner in the Manila-based law firm of Picazo Buyco Tan Fider & Santos (“Picazo”). Picazo serves as counsel in the Philippines to Bloomberry Resorts and Hotels Inc. (“BRHI”) and Sureste Properties Inc. (“SPI,” and together with BRHI, the “Bloomberry Defendants”) in their dispute with Global Gaming Philippines, LLC (“GGAM”). I make this Declaration on personal knowledge and in support of the motion of Defendant Enrique K. Razon, Jr., to dismiss Count V of the Second Amended Complaint (“SAC”) filed by GGAM.

2. I am aware that Defendant Razon is concurrently submitting an expert declaration regarding Philippine law from former Judge Marjorie T. Uyengco-Nolasco (“Nolasco Declaration”). I am familiar with the contents of the Nolasco Declaration and its attachments.

3. Picazo was counsel to the Bloomberry Defendants in the proceedings that resulted in the judicial filings appended to the Nolasco Declaration.

4. Exhibit 2 to the Nolasco Declaration is a true and correct copy of a February 25, 2014 Order from the Regional Trial Court-Makati, Branch 66 (“RTC”) in *Bloomberry Resorts and Hotels Inc. et al. v. Global Gaming Philippines, LLC et al.*, Special Proceeding Number M-7567.

5. Exhibit 3 to the Nolasco Declaration is a true and correct copy of a May 29, 2015 Resolution of the Special Tenth Division of the Philippine Court of Appeals (“Manila Court of Appeals”), in *Global Gaming Philippines, LLC v. Bloomberry Resorts and Hotels Inc. et al.*, CR-G.R. SP No 134340.

6. Exhibit 4 to the Nolasco Declaration is a true and correct copy of a November 27, 2015 Resolution of the Former Special Tenth Division of the Manila Court of Appeals, in *Global Gaming Philippines, LLC v. Bloomberry Resorts and Hotels Inc. et al.*, CR-G.R. SP No 134340.

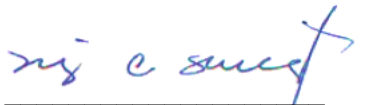
7. Exhibit 5 to the Nolasco Declaration is a true and correct copy (exclusive of its annexes) of Deutsche Bank AG Manila Branch’s September 11, 2017 Motion for Clarification and/or To Set Clarificatory Hearing *Ad Cautelam* submitted to the RTC in *Bloomberry Resorts and Hotels Inc. et al. v. Global Gaming Philippines, LLC et al.*, Special Proceeding Number M-7567.

8. Exhibit 6 to the Nolasco Declaration is a true and correct copy of a November 23, 2017 Order from the RTC in *Bloomberry Resorts and Hotels Inc. et al. v. Global Gaming Philippines, LLC et al.*, Special Proceeding Number M-7567.

9. Exhibit 7 to the Nolasco Declaration is a true and correct copy of a November 8, 2018 Decision of the Special Seventeenth Division of the Manila Court of Appeals, in *Global Gaming Philippines, LLC v. Bloomberry Resorts and Hotels Inc. et al.*, CR-G.R. SP No 153758.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Dated: April 18, 2022
Manila, the Philippines



Ninez C. Maningat